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Attorney for Defendant/Debtor Margaret Goldberg-O'Reilly

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re: Case No. 15-10722

MARGARET GOLDBERG-O'REILLY Chapter 7
Debtor

TIMOTHY HOFFMAN, Trustee in Bankruptcy AP No. 16-01019
Estate of Margaret Goldberg-O'Reilly
Plaintiff

**ANSWER TO COMPLAINT TO
DETERMINE VALIDITY,
PRIORITY AND EXTENT OF
LIENS AND INTERESTS**

United States of America, Internal Revenue
Service, State of California, Franchise Tax
Board, Perry, Johnson, Anderson, Miller &
Moskovitz, LLP, County of Sonoma Department
of Child Support Services, John Thomas
O'Reilly and Margaret Goldberg-O'Reilly
Defendants

1. Defendant Margaret Goldberg-O'Reilly is the Debtor in the underlying bankruptcy
case and a defendant in this action.

2. Defendant Margaret Goldberg-O'Reilly asserts the liens and interests of the
codefendants are as follows:

- a) United States of America / Internal Revenue Service \$0
- b) State of California / Franchise Tax Board \$0

1 c) Perry, Johnson, Anderson, Miller & Moskovitz, LLP' \$10,000

2 d) County of Sonoma Department of Child Support Services \$0

3 e) John Thomas O'Reilly \$0

4 3. Defendant Margaret Goldberg-O'Reilly agrees that Plaintiff is entitled to reasonable
5 attorneys fees for prosecuting this action.

6 WHEREFORE Defendant/Debtor prays that this Honorable Court enter judgment
7 providing substantially as follows:

8 A. That the liens and interests be determined as stated above;

9 B. For other relief as the Court deems just and proper.

10 Date: April 21, 2016

/s/Evan Livingstone

Evan Livingstone

11 Attorney for Debtor/Defendant

12 Margaret Goldberg-O'Reilly